

Notice – Response Template Amendment - July 27, 2016
Office of the State Treasurer and Receiver General

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Internet Address: <http://www.commbuys.com>;
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RFR File Name/Title: IRC 457 Deferred Compensation Plan – Investment Management Services Passive Index – REIT & International Equity
RFR File Number: 16-DC-Passive Index Services-REIT & Int'l Equity
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Please Note: The following questions were added to the end of the “General Questionnaire” on pg.16 of the Passive REIT & International Equity Response Template.

B. COMPLIANCE/INTERNAL CONTROL STRUCTURE

1. Provide a summary of your firm’s compliance program. Identify key personnel in the compliance process.
2. Does your firm maintain a Code of Ethics? If so, please describe.
3. Is your firm compliant with the CFA Institute Asset Manager Code of Professional Conduct? If not, discuss your firm’s reasons for choosing not to comply. (For reference the CFA Code of Professional Conduct can be found at www.cfainstitute.org/ethics/codes/assetmanager/Pages/index.aspx.)
4. How quickly are you able to provide audited asset and transaction statements after month end?
5. Have you ever violated a client guideline in a broad mandate portfolio? If so, please describe the violation and the resolution.